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**IN THE UNITED STATES DISTRICT COURT IN AND FOR
THE DISTRICT OF UTAH, CENTRAL DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

CHAD AUSTIN BAWDEN,

Defendant.

EX PARTE MOTION FOR ORDER TO
APPOINT CO-COUNSEL PURSUANT TO
18 U.S.C. §3006A

Case Number: 2:22-CR-481

Magistrate Judge Dustin Pead

The defendant, Chad Austin Bawden, by and through his attorney of record, G. Fred Metos, moves this court to enter an order appointing Cathy Nester pursuant to 18 U.S.C. §3006A to represent the defendant as co-counsel in the above-entitled case. This motion is made on the grounds and for the reason that the undersigned counsel was appointed pursuant to 18 U.S.C. §3006A to represent the defendant, Chad Austin Bawden, in this case. At that time the court indicated that it would be willing to appoint co-counsel to assist in representing the defendant. Co-counsel is necessary in this case to provide the defendant with effective assistance of counsel. That is because the case involves nine codefendants, including the defendant, Chad Austin Bawden. The Indictment

alleges three conspiracy counts covering a six-year period. Those conspiracies relate to the offenses of wire fraud, bank fraud and money laundering. The Indictment also alleges eleven other substantive counts of wire fraud, aggravated identity theft and money laundering. At the arraignment the government indicated that the discovery materials involve 1.2 terabytes of materials. Due to the quantity of the discovery and the scope and nature of the charges, experienced co-counsel is necessary to provide the defendant with effective assistance of counsel as required by the Sixth Amendment.

DATED this 16th day of December, 2022.

s/ G. Fred Metos

G. FRED METOS
Attorney for Defendant